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REPLY TO:

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June 30, 1997

TO: All Interested Parties

FROM: Amy S. Carter, Chief, Program Support Section

SUBJECT: Monthly Monitoring Requirements for Release Detection

The December 22, 1998 deadline has one additional significant implication to those covered in the "Don't Wait Until 1998" booklet. This significant date, under the Michigan Underground Storage Tank Rules (MUSTR), is also the deadline for allowing "inventory control" or "manual tank gauging" conducted in accordance with Section 280.43(a) or (b), and in conjunction with the periodic tank tightness testing in accordance with Section 280.43(c), to be chosen as a method of release detection for newly installed tanks.

Please note: New tanks installed after December 22, 1998, must select a method of release detection from one of those listed in Section 280.43(d) through (h). Selection of the methods in Section 280.43(a) or (b) for tanks used for motor fueling, or tanks that have a capacity of more than 550 gallons, is not acceptable under MUSTR.

Owners and operators who are currently using inventory control in conjunction with periodic tank tightness testing, in accordance with one of the exceptions in (1) and (2) of Section 280.4 1(a), at this time are reminded that they can continue to use this method for only ten years after the tank is installed or upgraded. This ten year period ends on December 22, 1998, for those tanks that meet the performance standards for new USTs as required in Section 280.20, or have met all the upgrading requirements of Section 280.21 of MUSTR, on or before December 22, 1988. However, for tanks that were installed after December 22, 1988, the ten year period may be any time after December 22, 1998, and before December 22, 2008. Following the ten year deadline, owners and operators are required to choose one of the methods of monthly monitoring listed in Section 280.43(d) .(h) in compliance with Section 280.4 1(a) of MUSTR.

Please note: The "Don't Wait Until 1998" booklet only addresses the upgrading deadline for corrosion protection and overfill prevention. Spill protection has been required since January 1992, and release detection has been required prior to December 22, 1993. Therefore, by December 22, 1998, all tanks installed prior to 1988 must meet all the requirements of Section 280.21.

If you have any questions regarding the specific requirements for tanks at your facility, please contact the Technical Review Unit, at 517-373-8168.